

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

TAMMY MCCRAE-COLEY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:21-cv-666
	)	
STARTER HOMES PROGRAMS INC.,	)	
<i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**STARTER HOMES DEFENDANTS' MOTION *IN LIMINE***

Pursuant to the Federal Rules of Evidence, the Federal Rules of Civil Procedure, and the Court's orders, Defendants Starter Programs Homes, Inc., d/b/a renttoownhomefinder.com and Lending Cloud Homes; Starter Home Investing, Inc., d/b/a renttoownhomefinder.com and Lending Cloud Homes; Xanadu Marketing, Inc., individually (assumed name Apex Page Builder), d/b/a cloudbasedpersonalloans.com and xanadutrucking.com; and Insurance-Reviewed.com (collectively hereinafter, "Starter Homes Defendants" or "Defendants") hereby move *in limine*, asking for an order precluding plaintiff, Tammy McCrae-Coley, from introducing evidence concerning, or arguing, the following:

- a) Plaintiff's late-disclosed evidence;
- b) Any alleged actual injury or harm (including physical, psychological/emotional, and economic harm) to Plaintiff;

- c) Settlement discussions among the parties;
- d) Joe Delfgauw's real estate licenses; and
- e) "Sending a message" or invoking the Golden Rule.

For support, Defendants rely on their contemporaneously filed memorandum of law and the accompanying exhibits.

WHEREFORE, the Starter Home Defendants respectfully ask that their motion *in limine* be granted.

Respectfully submitted, this the 18th day of January, 2023.

/s/B. Tyler Brooks

B. Tyler Brooks (N.C. Bar No. 37604)  
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*Counsel for Defendants*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed with the Court's CM/ECF system on January 18, 2023, which will send an electronic copy to the plaintiff and that a copy was also served via email and First Class U.S. mail at the address below.

/s/B. Tyler Brooks  
B. Tyler Brooks

#### **SERVED:**

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*Pro se Plaintiff*